



KAUFMAN BORGEEST & RYAN LLP

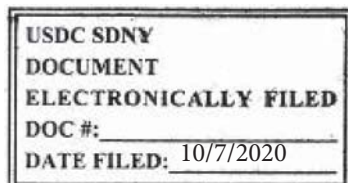
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October 6, 2020

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VIA ECF

Honorable Alison J. Nathan
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York



Re: *Mohamed Farghaly v. Potamkin Cadillac-Buick-Chevrolet-Geo, Ltd., et al.*
S.D.N.Y. Civil Action No.: 18-CV-11106 (AJN)

Dear Judge Nathan:

We represent the Defendants in the above referenced matter. This matter is currently scheduled for a jury trial commencing on January 19, 2021. The Parties Joint Pre-Trial Report ("JPTR") is currently due on October 12, 2020.¹ Pursuant to Paragraph 1(D) of Your Honor's Individual Practices, we write jointly with Plaintiff's counsel to request an approximately fifty (50) day extension of the JPTR deadline until December 4, 2020. This date is approximately forty-five (45) days before the trial commencement date.

SO ORDERED. *Alison J. Nathan* 10/6/2020

The reason for the request is due, in part, to the fact that the parties have been focusing on the completion of expert discovery. Most recently, the parties conducted the deposition of Plaintiff's expert on September 17, 2020. Counsel for the parties agree that both parties need additional time to confer regarding the JPTR items, and anticipate that the additional time to prepare the JPTR submission will streamline the trial for the Court.

Respectfully submitted,

KAUFMAN BORGEEST & RYAN LLP

Laura B. Juffa

cc: (via ECF)

Ishan Dave, Esq.
THE DEREK SMITH LAW GROUP
Attorneys for Plaintiff

¹ October 13, 2020 due to the Columbus Day holiday.